

Honorable Robert J. Bryan

IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT TACOMA

GEORGE DC PARKER II and LORI A.
PARKER,

Plaintiff(s),

v.

THE SOCIETY FOR CREATIVE
ANACHRONISM, INC., a/k/a/ "SCA" or
"SCA, Inc.", et.al,

Defendant(s).

NO. 3:23-cv-05069-RJB

DECLARATION OF LOUISE DU CRAY IN
SUPPORT OF MOTION TO VACATE
DEFAULT

I, Louise Du Cray, am over the age of 21 and competent to testify to the facts contained in this declaration under penalty of perjury under the laws of the State of Washington and California. I declare and state as follows:

1. I was hired as VP of Corporate Operations-Elect for the Society of Creative Anachronism (SCA) on June 1, 2021. I took over officially as VP of Corporate Operations (and Secretary of the Corporation) on October 1, 2021.

2. SCA is a 501(c)(3) non-profit volunteer educational organization devoted to the research and re-creation of pre-seventeenth century skills, arts, combat and culture by

1 employing knowledge of history to enrich the lives of participants through events,
2 demonstrations and other educational activities

3 3. The SCA's corporate offices address until August 2021 was 1759 S. Main Street,
4 Ste 108 Building 5, Milpitas, CA 95035-6765. In August of 2021, the SCA moved to 1580
5 Oakland Rd., Suite C-104, San Jose, CA 95131. The SCA corporation also had a PO Box in
6 Milipitas, California until January of 2022. We then moved our PO Box to San Jose along with
7 the SCA's physical address. The SCA has been working to inform all vendors of our move and
8 to get these vendors to update our information since our move.

9 4. I personally spoke to the SCA's account manager at CT Corporation in February
10 of 2022 and requested that they update our contact information as soon as possible. I learned
11 during the week of May 15th – May 19th 2023 that CT Corporation had not changed our address
12 as requested. Our understanding from CT Corporation is that Plaintiffs served their complaint on
13 April 24, 2023. We however were not provided with the Complaint in this matter by CT
14 Corporation because they mailed the summons and complaint to our old address, which was
15 not forwarded to our current office. SCA only learned about this lawsuit via an alert on
16 Courtlistener that another VP in our organization received on or about May 14, 2023.

17 5. I reached out to CT Corporation on May 18 to find out why SCA never received
18 notice from them about the service of the summons and complaint. CT Corporation confirmed to
19 me that they had not updated their records to reflect SCA's change of address and therefore the
20 notices went to the old address locations.

21 6. We immediately informed our corporate attorney, who is not licensed in
22 Washington, forcing SCA to work to identify competent counsel admitted to appear in the United
23 States District Court for the Western District of Washington. We immediately engaged local
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1 counsel at Preg O'Donnell & Gillett, PLLC, as soon as possible who appeared the very next day
2 on May 19, 2023.

3 DATED this 23rd day of May, 2023, at San Jose, California.

4
5 By Louise Du Cray
6 Louise Du Cray
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DECLARATION OF SERVICE

I hereby declare that on this day I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the attorneys of record listed below:

**Counsel for Plaintiffs George DC
Parker II and Lori A. Parker:**

George DC Parker II
Lori A. Parker
10710 199th Street East
Graham, WA 98338

☐ **Via Messenger**

☐ **Via Facsimile –**

☒ **Via U.S. Mail, postage prepaid**

☐ **Via Overnight Mail, postage prepaid**

☒ **Via Court E-Service or email with recipient's approval
*thenorsegypsyforge@gmail.com***

DATED at Seattle, Washington, this 23rd day of May, 2023.

/s/ Justin E. Bolster

Justin E. Bolster, WSBA #38198